

MEL:RAS/JKW
F. #2021R00415

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

ELIJAH WUSU,
also known as "Lucky,"

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Sex Trafficking Conspiracy)

1. In or about and between March 2019 and September 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ELIJAH WUSU, also known as "Lucky," together with others, did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means one or more persons, in and affecting interstate commerce, and to benefit, financially and by receiving anything of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) one or more such persons had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was to be effected by force, fraud,

I N D I C T M E N T

1:22-cr-00095(DLI)(JRC)

Cr. No. _____
(T. 18, U.S.C., §§ 1591(a)(1), 1591(a)(2),
1591(b)(1), 1591(b)(2), 1594(c),
1594(d), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p))

coercion and a combination of such means, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(c) and 3551 et seq.)

COUNT TWO

(Sex Trafficking – Jane Doe #1)

2. In or about and between March 2019 and April 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ELIJAH WUSU, also known as “Lucky,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #1, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane Doe #1 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 2 and 3551 et seq.)

COUNT THREE

(Sex Trafficking of a Minor – Jane Doe #2)

3. In or about and between March 2019 and April 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ELIJAH WUSU, also known as “Lucky,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit:

Jane Doe #2, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane Doe #2 to engage in one or more commercial sex acts, and (2) Jane Doe #2 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, having had a reasonable opportunity to observe Jane Doe #2, and which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 2 and 3551 et seq.)

COUNT FOUR
(Sex Trafficking – Jane Doe #3)

4. In or about and between January 2020 and March 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ELIJAH WUSU, also known as “Lucky,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #3, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane

Doe #3 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of (a) any property, real or personal, that was involved in, used or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, or any property traceable to such property.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.# 2021R00415
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ELIJAH WUSU, also known as "Lucky,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 1594(c),
1594(d), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

*Rachel A. Shanies and Jessica K. Weigel, Assistant U.S. Attorneys (718)
254-6140/6157*